

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 1:17-mc-00151-LPS

**DECLARATION OF STEPHEN C. CHILDS, ESQ. IN SUPPORT OF
REPLY OF THE BOLIVARIAN REPUBLIC OF VENEZUELA,
PETRÓLEOS DE VENEZUELA, S.A., AND PDV HOLDING, INC.
REGARDING POTENTIAL FUTURE PROCEDURES**

I, Stephen C. Childs, declare as follows:

1. I am an attorney admitted to the Bar of the State of Delaware and this Court and an attorney in the law firm of Abrams & Bayliss LLP. I represent Defendant Bolivarian Republic of Venezuela (“Republic”) in the above-captioned action and have personal knowledge of the facts set forth below.

2. I submit this declaration in support of the Reply of The Bolivarian Republic of Venezuela and Petróleos De Venezuela, S.A., and PDV Holding, Inc. Regarding Potential Future Procedures.

3. Attached as Exhibit 1 to this declaration is a true and correct copy of the article published by the United States Dep’t of the Treasury, *Treasury Targets Venezuelan President Maduro’s Inner Circle and Proceeds of Corruption in the United States*, dated September 25, 2018, available at <https://home.treasury.gov/news/press-releases/sm495>.

4. Attached as Exhibit 2 to this declaration is a true and correct copy of the Statement of the President of the Comisión Permanente de Energía y Petróleo (Standing Commission on Energy and Petroleum) of the Venezuelan National Assembly, dated July 1, 2020, with certified translation thereof.

5. Attached as Exhibit 3 to this declaration is a true and correct copy of Venezuela's Law on Protection of Privacy of Communications (ley sobre proteccion a la privacidad de las comunicaciones), Official Gazette of the Republic of Venezuela No. 34.863, (December 16, 1991), *available at* <https://home.treasury.gov/news/press-releases/sm495>, with certified translation thereof.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct.

Executed this 13th day of July, 2020, in Wilmington, Delaware.

/s/ Stephen C. Childs

Stephen C. Childs, Esq.